

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

No. 22 Civ. 10016 (LAK) (JLC)

NOTICE OF PLAINTIFF E. JEAN CARROLL'S OMNIBUS MOTION IN LIMINE

PLEASE TAKE NOTICE that Plaintiff E. Jean Carroll hereby moves this Court, before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for an order in limine (1) admitting Carroll's prior consistent statements to Lisa Birnbach and Carol Martin about Defendant Donald J. Trump's attack; (2) admitting the testimony of Natasha Stoyloff and Jessica Leeds regarding their own experiences with Trump; (3) excluding testimony from witnesses whom Trump has not disclosed, precluding Trump from testifying to undisclosed information, and precluding any testimony or commentary concerning DNA evidence; (4) precluding cross-examination or evidence regarding Stephanie Grisham's prior misdemeanor convictions, her unrelated pending lawsuit, and her use of a prescription medication; (5) precluding comments and cross-examination regarding Carroll's choice of counsel; and (6) precluding Robert J. Fisher from testifying as a rebuttal expert witness.

This motion is supported by the annexed memorandum of law and the declaration of Roberta A. Kaplan and accompanying exhibits.

Dated: New York, New York
February 23, 2023

Respectfully submitted,



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